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Attorneys for Respondents AGRA-
Technologies, Inc.; William Jay
and Sandra Lee Pierson; and William
H. and Patricia M. Baker

AZ CORP COMMISSION
DOCUMENT CONTROL

Lonnie J. Williams, Jr. (#005966)
Carrie M. Francis (#020453)

BEFORE THE ARIZONA CORPORATION COMMISSION

In the matter of:

AGRA-TECHNOLOGIES, INC. (a/k/a ATI),
a Nevada corporation,
5800 North Dodge Avenue, Bldg. A
Flagstaff, AZ 86004-2963;

WILLIAM JAY PIERSON (a/k/a BILL
PIERSON) and SANDRA LEE PIERSON
(a/k/a SANDY PIERSON), husband and wife,
6710 Lynx Lane
Flagstaff, AZ 86004-1404;

RICHARD ALLEN CAMPBELL (a/k/a
DICK CAMPBELL) and SONDR A JANE
CAMPBELL, husband and wife,
8686 West Morten Avenue
Glendale, AZ 85304-3940;

WILLIAM H. BAKER, JR. (a/k/a BILL
BAKER) and PATRICIA M. BAKER,
husband and wife,
3027 N. Alta Vista
Flagstaff AZ 86004

JERRY J. HODGES and JANE DOE
HODGES, husband and wife,
1858 Gunlock Court
St. George, UT 84790-6705;

LAWRENCE KEVIN PAILLE (a/k/a
LARRY PAILLE) and JANE DOE PAILLE,
husband and wife,
220 Pinon Woods Drive
Sedona, AZ 85351-6902;

Respondents.

DOCKET NO. S-20484A-06-0669

**ANSWER TO TEMPORARY
ORDER TO CEASE AND DESIST
FOR RESPONDENTS AGRA-
TECHNOLOGIES, INC.;
WILLIAM JAY AND SANDRA
LEE PIERSON; AND WILLIAM H.
AND PATRICIA M. BAKER**

Arizona Corporation Commission

DOCKETED

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DOCKETED BY

1 Respondents AGRA-Technologies, Inc., William Jay and Sandra Lee Pierson, and
2 William H. and Patricia M. Baker ("Respondents") for their Answer to the Arizona
3 Corporation Commission's Temporary Order to Cease and Desist ("Temporary Order"),
4 hereby admit, deny, and allege as follows:

5 **I.**

6 **JURISDICTION**

7 1. Respondents admit the Arizona Corporation Commission has jurisdiction
8 over this matter.

9 **II.**

10 **RESPONDENTS**

11 2. Respondents admit the allegations in Paragraph 2 of the Temporary Order.

12 3. Respondents admit that William Jay Peirson's ("PIERSON") address is 6710
13 Lynx Lane, Flagstaff, Arizona 86004-1404 and that from May 1, 1998, PIERSON has
14 acted as AGRA's President, Director and Chief Executive Officer. Respondents deny the
15 remaining allegations in Paragraph 3 of the Temporary Order.

16 4. Respondents admit that at all relevant times Sandra Lee Pierson was the
17 spouse of PIERSON. Respondents deny the remaining allegations of Paragraph 4 of the
18 Temporary Order.

19 5. Respondents admit that Richard Campbell's ("CAMPBELL") address is 8686
20 West Morten Avenue, Glendale, Arizona 85305-3940 and that from July 23, 2003 to June
21 15, 2006, CAMPBELL acted as AGRA's Vice President and Director. Respondents deny
22 the remaining allegations in Paragraph 5 of the Temporary Order.

23 6. Respondents deny the allegations in Paragraph 6 of the Temporary Order.

24 7. Respondents admit that William H. Baker's ("BAKER") address is 3027 N.
25 Alta Vista, Flagstaff, Arizona, 86004 and that since July 2003, BAKER has acted AGRA's
26 Secretary, Treasurer, and CFO. Respondents deny the remaining allegations in Paragraph
27 7 of the Temporary Order.

28 ...

8. Respondents admit that at all relevant times Patricia M. Baker was the spouse of BAKER. Respondents deny the remaining allegations in Paragraph 8 of the Temporary Order.

9. Respondents admit that Jerry J. Hodges' ("HODGES") address is 1858 Gunlock Court, St. George, Utah 84790-6705. Respondents deny the remaining allegations in Paragraph 9 of the Temporary Order.

10. Respondents deny the allegations in Paragraph 10 of the Temporary Order.

11. Respondents admit that Lawrence Kevin Paille's ("PAILLE") address is 220 Pinon Woods Drive, Sedona, Arizona 86351-6902. Respondents deny the remaining allegations in Paragraph 11 of the Temporary Order.

12. Respondents deny the allegations in Paragraph 12 of the Temporary Order.

13. Paragraph 13 of the Temporary Order contains no allegations and therefore does not require a response.

14. Paragraph 14 of the Temporary Order contains no allegations and therefore does not require a response.

III.

FACTS

A. RESPONDENTS' PURPORTED PRECIOUS METAL RECOVERY EXPERTISE AND TECHNOLOGIES

15. Respondents deny the allegations in Paragraph 15 of the Temporary Order.

16. Respondents deny the allegations in Paragraph 16 of the Temporary Order.

17. Respondents deny the allegations in Paragraph 17 of the Temporary Order.

18. Respondents deny the allegations in Paragraph 18 of the Temporary Order.

B. THE ORE RIGHTS & MINING AGREEMENTS

19. Respondents deny the allegations in Paragraph 19 of the Temporary Order.

20. Respondents deny the allegations in Paragraph 20 of the Temporary Order.

21. Respondents deny the allegations in Paragraph 21 of the Temporary Order.

22. Respondents deny the allegations in Paragraph 22 of the Temporary Order.

- 1 23. Respondents deny the allegations in Paragraph 23 of the Temporary Order.
2 24. Respondents deny the allegations in Paragraph 24 of the Temporary Order.
3 25. Respondents deny the allegations in Paragraph 25 of the Temporary Order.
4 26. Respondents deny the allegations in Paragraph 26 of the Temporary Order

5 **C. THE AGRA STOCK**

- 6 27. Respondents deny the allegations in Paragraph 27 of the Temporary Order.
7 28. Respondents deny the allegations in Paragraph 28 of the Temporary Order.
8 29. Respondents deny the allegations in Paragraph 29 of the Temporary Order.
9 30. Respondents deny the allegations in Paragraph 30 of the Temporary Order.

10 **D. RESPONDENTS' REPRESENTATIONS THAT THEY CAN EXTRACT**
11 **PRECIOUS METALS FROM VOLCANIC CINDERS ON A COST**
EFFECTIVE BASIS IS FALSE

- 12 31. Respondents deny the allegations in Paragraph 31 of the Temporary Order.
13 32. Respondents deny the allegations in Paragraph 32 of the Temporary Order.
14 33. Respondents deny the allegations in Paragraph 33 of the Temporary Order.
15 34. Respondents deny the allegations in Paragraph 34 of the Temporary Order
16 35. Respondents deny the allegations in Paragraph 35 of the Temporary Order.
17 36. Respondents deny the allegations in Paragraph 36 of the Temporary Order.
18 37. Respondents deny the allegations in Paragraph 37 of the Temporary Order.
19 38. Respondents deny the allegations in Paragraph 38 of the Temporary Order.
20 39. Respondents deny the allegations in Paragraph 39 of the Temporary Order.

21 **E. RESPONDENTS' ONGOING ACTIVITY**

- 22 40. Respondents deny the allegations in Paragraph 40 of the Temporary Order.
23 41. Respondents deny the allegations in Paragraph 41 of the Temporary Order.

24 **IV.**

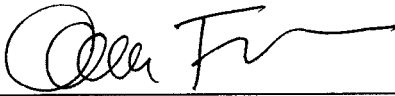
25 **VIOLATION OF A.R.S. § 44-1841**

26 **Offer and Sale of Unregistered Securities**

- 27 42. Respondents deny the allegations in Paragraph 42 of the Temporary Order.
28 43. Respondents deny the allegations in Paragraph 43 of the Temporary Order.

1 RESPECTFULLY SUBMITTED this 20th day of November, 2006.

2 QUARLES & BRADY STREICH LANG LLP

3
4 By 

5 Lonnie J. Williams, Jr.

6 Carrie M. Francis

7 Attorneys for Named Respondents

8 ORIGINAL and 13 copies of the
9 foregoing hand delivered this 20th day
10 of November, 2006, to:

11 Docket Control
12 Arizona Corporation Commission
13 1200 West Washington Street
14 Phoenix, AZ 85007

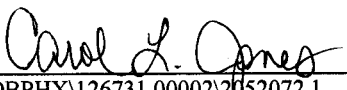
15 COPY of the foregoing hand delivered this
16 20th day of November, 2006, to:

17 Securities Division
18 Arizona Corporation Commission
19 Attn: Mike Dailey and Mark Dinell
20 1300 West Washington Street
21 Phoenix, AZ 85007

22 ONE COPY of the foregoing mailed
23 this 20th day of November, 2006, to:

24 Peter Strojnik
25 The Law Firm of Peter Strojnik
26 3030 North Central Ave.
27 Suite 1401
28 Phoenix, AZ 85012
Attorneys for Respondents Campbells

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Suite 204
Scottsdale, AZ 85251
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